

VALIDATION AND COMPLIANCE PLAN FOR THE

EXAMPLE VALIDATION SPREADSHEET

SERVING

OFNI SYSTEMS RALEIGH, NORTH CAROLINA

S

DOCUMENT NUMBER: VCP-001 DATE ISSUED: 11/12/08 REVISION: 0

> PREPARED BY DANIEL WATERMAN VALIDATION MANAGER OFNI SYSTEMS

DISTRIBUTED BY OFNI SYSTEMS, INC. AS A SAMPLE VALIDATION DOCUMENT

Ofni Systems: Example Validation Spreadsheet		Doc. #: VCP-001
Validation and Compliance Plan		Rev. #: 0
Department: Validation	Author: Daniel Waterman, Validation Manager, Ofni Systems	Page 2 of 11

Thank you for downloading this sample validation document.

Ofni Systems can validate all of your software, databases, spreadsheets and computer systems, and develop the appropriate documentation for all phases of the software life cycle. We can provide any level of service required, from executing test scripts generated from your existing specifications to writing the entire validation package. Ofni Systems will perform risk assessments to focus the validation effort on the most appropriate sections of your system.

These sample validation documents were produced with the <u>FastVal Validation Document generator</u> software, which allows us to complete validation projects in <u>70% less time</u> than traditional validation methods, with more time spent testing your software and less time preparing documentation. Our goal in all software validation projects is to improve the quality and value of your computer system.

Ofni Systems validation specialists have experience working within the compliance requirements of established regulated companies. Our specialists are experts in industry validation standards and will produce validation documents which will meet or exceed your exacting standards.

Ofni Systems is a leader in providing regulatory compliance solutions for pharmaceutical, biotech and medical device companies. They are the creators of <u>ExcelSafe for Excel spreadsheet security</u> and the <u>Part 11 Toolkit for compliant databases</u>. They also are the creators of the <u>FastVal validation software for generating and executing validation documents</u>, and have been providing <u>professional validation services</u> using FastVal since 2006. Their products for Part 11 compliant databases and spreadsheets are used by pharmaceutical, biotech and medical device companies across the globe, while it's products for computer validation, auditing and FDA submissions ensure that their clients meet every requirement for electronic records and electronic signatures.

How can we help you? Contact Ofni Systems at by email or by phone (919) 844-2494.

Ofni Systems

Tools for Compliance

<u>FastVal</u>™

Produce validation documents, manage validation projects and execute testing protocols electronically in 70% less time.

ExcelSafe[™]

Makes existing MS Excel spreadsheets compliant with all the technical requirements of 21 CFR Part 11.

Part 11 Toolkit™

Transform MS Access programs into powerful, secure systems that meet all requirements of Part 11.

Part 11 Advisor™

Assess all of your computer systems for compliance, perform gap analysis and create corrective action plans.

Consulting and Services

Part 11 Assessments

Determine the compliance status of your computer systems.

Computer Validation

Validate new or updated software, database and computer systems.

Custom Programs

Develop a compliant computer system specific to your requirements.

Data Migration

Convert existing legacy data to an Access or SQL Server database.

Compliance Training

Learn to build a fully Part 11 compliant electronic record system.

Ofni Systems: Example Validation Spreadsheet		Doc. #: VCP-001
Validation and Compliance Plan		Rev. #: 0
Department: Validation	Author: Daniel Waterman, Validation Manager, Ofni Systems	Page 3 of 11

SIGNATURES

Author:	_
Signature:	Date:
System Owner:	_
Signature:	Date:
Quality Assurance:	_
Signature:	Date:

REVISION HISTORY

Rev #	Description	Date Approved
0	Initial Issue.	
	Itni Sveton	16

Ofni Systems: Example Validation Spreadsheet		Doc. #: VCP-001
Validation and Compliance Plan		Rev. #: 0
Department: Validation	Author: Daniel Waterman, Validation Manager, Ofni Systems	Page 4 of 11

TABLE OF CONTENTS

1.	INTRODUCTION
1.1.	Objectives5
	Scope
1.3.	Assumptions/Restrictions Error! Bookmark not defined.
2.	ACRONYMS AND REFERENCES
2.1.	Acronyms and Definitions
2.2.	References
3.	RESPONSIBILITIES
3.1.	Project Sponsor
3.2.	System Owner
3.3.	Business Owner
3.4.	Validation Manager
3.5.	Validation Resources
3.6.	Quality Assurance7
3.7.	Project Personnel7
4.	SYSTEM DESCRIPTION
5.	VALIDATION STRATEGY AND OVERVIEW7
5.1.	Validation Testing Strategy7
5.2.	Validation Documents7
5.3.	Compliance Objectives
5.4.	Deviation Resolution Process
5.5.	Other Validation Requirements

Ofni Systems: Example Validation Spreadsheet		Doc. #: VCP-001
Validation and Compliance Plan		Rev. #: 0
Department: Validation	Author: Daniel Waterman, Validation Manager, Ofni Systems	Page 5 of 11

1. Introduction

1.1. Objectives

This is the Validation and Compliance Plan for the Example Validation Spreadsheet (VCP-001), for use by Validation Department at Ofni Systems (Raleigh, NC). The Example Validation spreadsheet has been identified a Category 5 cGxP system (customized MS Excel spreadsheet).

The Validation and Compliance Plan for the Example Validation Spreadsheet defines the methodology, deliverables and responsibilities for the validation of the Example Validation Spreadsheet. The Validation and Compliance Plan will also describe criteria for final acceptance of validation deliverables, system release and the controls that Ofni Systems has the controls in place to maintain Example Validation Spreadsheet in a validated state.

1.2. Scope

This Validation and Compliance Plan applies to the Example Validation Spreadsheet. The VCP will define the strategy, risk mitigation, project deliverables and acceptance criteria for the validation of the Example Validation Spreadsheet.

1.3. Assumptions

The validation will be performed on a properly functioning Ofni Systems workstation, with MS Excel and ExcelSafe properly installed.

1.4. Exclusions

This validation applies to the Example Validation spreadsheet, and not to MS Excel, ExcelSafe, the workstation or computer environment.

2. Acronyms and References

2.1. Acronyms and Definitions

Cell - An individual square in a spreadsheet grid.

CFR - Code of Federal (US) Regulations

cGxP - Abbreviation which includes current Good Manufacturing, Clinical and Laboratory Practices

ems

Closed System - An environment in which system access is controlled by persons who are responsible for the content of electronic records that are on the system.

FRS - Functional Requirements Specification

GUI - Graphical User Interface

IOQ - Installation/Operational Qualification

LAN - Local Area Network

Open System - An environment in which system access is not controlled by persons who are responsible for the content of electronic records that are on the system.

SDS - Software Design Specification

SOP - Standard Operating Procedure

Spreadsheet - Generic term for application containing rows and columns of cells, with functions to manipulate data within those cells.

Workbook - A group of one or more worksheets contained within a spreadsheet file. The workbook may also include code modules.

Worksheet - One of possibly multiple data sheets within a workbook.

Ofni Systems: Example Validation Spreadsheet		Doc. #: VCP-001
Validation and Compliance Plan		Rev. #: 0
Department: Validation	Author: Daniel Waterman, Validation Manager, Ofni Systems	Page 6 of 11

2.2. References

21 CFR Part 11 "Electronic Records; Electronic Signatures"

GAMP 5, A Risk-Based Approach to Compliant GxP Computerized Systems

3. Responsibilities

- 3.1. Project Sponsor
 - 3.1.1. Serves as project champion to the business, including communicating the project goals to the business as a whole.
 - 3.1.2. Approves the budget, determines budget tolerances and assures availability of essential project resources.
 - 3.1.3. Has ultimate authority and responsibility for the project.

3.2. System Owner

- 3.2.1. Provides technical expertise related to system and database design, including specific guidance relative to approach, methodology, etc. as requested.
- 3.2.2. Assists in development and execution of training required by the validation project.
- 3.2.3. Manages the development of system process SOPs and maintains SOPs as appropriate.
- 3.2.4. Reviews and approves of key project deliverables.
- 3.2.5. Performs validation periodic reviews of the validated computer system to ensure it is operated in compliance with all Policies, SOPs, and regulatory requirements and is being maintained in a controlled manner

3.3. Business Owner

- 3.3.1. Ensures that the computer related system meets the business needs of the user departments.
- 3.3.2. Represents the user departments when making critical decisions.
- 3.3.3. Assists in testing to ensure the system is tested properly.
- 3.3.4. Reviews and approves all computer validation and training documentation to ensure that the information is accurate and complete from the business process perspective.
- 3.3.5. Ensures that Standard Operating Procedures are in place for user operations.
- 3.4. Validation Manager
 - 3.4.1. Manages overall project resources and is the point contact for the project.
 - 3.4.2. Leads the Validation sub-team in developing validation deliverables, including this Validation Plan and Validation Summary Report
 - 3.4.3. Provides specific guidance relative to approach, methodology, etc.
 - 3.4.4. Monitors project progress per validation plan.
 - 3.4.5. Reviews and approves of key project deliverables.
- 3.5. Validation Resources
 - 3.5.1. Provides Subject Matter expertise on all aspects of the validation project, as required.